

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE, et al.,**

**Defendants.**

\_\_\_\_\_ /

**MOTION TO FILE SEALED DOCUMENT**

Plaintiffs move to file Plaintiffs' unredacted Motion Regarding Deposition Conduct as well as Exhibit 1 to the Declaration of Vanessa Baehr-Jones under seal.

Sealed Filing is appropriate with respect to Exhibit 1 because it contains confidential testimony from Female 4.

Sealed filing is also appropriate with respect to the Motion because the redacted portions contain information from Exhibit 1.

Dated: June 7, 2024

Respectfully submitted,

/s/ Elizabeth A. Kramer

Julie C. Erickson (California Bar # 293111)  
Elizabeth A. Kramer (California Bar # 293129)  
Kevin M. Osborne (California Bar #261367)

*Pro Hac Vice*

Erickson Kramer Osborne LLP  
44 Tehama St.  
San Francisco, CA 94105  
415-635-0631  
julie@eko.law  
elizabeth@eko.law  
kevin@eko.law

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

*Pro Hac Vice*

Advocates for Survivors of Abuse PC

4200 Park Boulevard No. 413

Oakland, CA 94602

(510) 500-9634

vanessa@advocatesforsurvivors.com

HMC Civil Rights Law, PLLC

/s/ Heather Moore Collins

Heather Moore Collins (# 026099)

Ashley Shoemaker Walter (#037651)

7000 Executive Center Dr., Suite 320

Brentwood, TN 37027

615-724-1996

615-691-7019 FAX

heather@hmccivilrights.com

ashley@hmccivilrights.com

Attorneys for Plaintiffs and Proposed Class

## CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 7, 2024 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK &amp; ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 lisa@hbm-lawfirm.com sandy@hbm-lawfirm.com</p> <p>Emily C. Taylor Maria Ashburn WATSON, ROACH, BATSON &amp; LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 etaylor@watsonroach.com mashburn@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p> <p>Jonathan P. Lakey Burch, Porter, &amp; Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 901-524-5000 jlakey@bpjlaw.com mchrisman@bpjlaw.com</p> <p><i>Attorney to Defendant City of Johnson City, Tennessee</i></p>	<p>Daniel H. Rader III Daniel H. Rader IV MOORE, RADER &amp; YORK PC 46 N. Jefferson Avenue P.O. Box 3347 Cookeville, TN 38502-3347 danrader@moorerader.com danny@moorerader.com andre@moorerader.com</p> <p><i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law jdowd@fbb.law</p> <p><i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant Laura Beth Rufolo Robinson, Smith &amp; Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 kgrant@rswlaw.com lrufolo@rswlaw.com awells@rswlaw.com</p> <p><i>Counsel for Justin Jenkins in his individual capacity, Jeff Legault in his individual capacity and Brady Higgins in his individual capacity</i></p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

/s/ Elizabeth A. Kramer  
Elizabeth A. Kramer